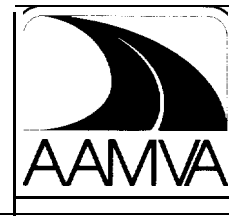


AMERICAN ASSOCIATION OF MOTOR VEHICLE ADMINISTRATORS



JOHN H. STRANDQUIST, CAE
Executive Director

DONALD E. WILLIAMS, President
Commissioner, Department of Motor Vehicles
Virginia

QA-18008

FHWA-97-2199-41

August 13, 1993

Office of Chief Counsel
Federal Highway Administration
400 Seventh Street, SW
Washington, DC 20590

Re: FHWA Docket No. MC-93-12
Room 4232, HCC 10

93 AUG 17 P 1:50
LEGS/REGS. DIV.

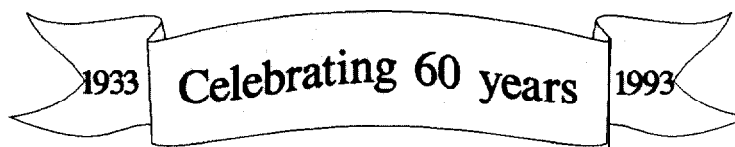
Dear Chief Counsel:

As indicated by the state of New Mexico in their comments to the docket, on the surface it would seem that extending the Commercial Driver License program to include a minimum level of training for all entry level drivers wanting to obtain a CDL is both a reasonable and logical extension.

However, there are many possible effects that a national training standards program, as a CDL requirement, will have on licensing agencies. From our Association's perspective, I feel these areas need to be addressed.

If it is the intent of FHWA to establish a national standard and then shift the regulatory responsibility to the states, what funds will be made available for states to expand their current CDL programs, to incorporate the training module? The cost of revamping the current automated/manual systems, hiring additional personnel to audit compliance and complying with reporting requirements could potentially outweigh any perceived benefit of the program. If the enforcement/reporting requirements are split between state agencies, the program becomes fragmented and will be an administrative burden for FHWA as well as the states!

Our Administrators are extremely concerned about the competence and skill level of drivers we are allowing to operate on our highways. In addition, it is our feeling that the motor carrier industry has responded to the need for qualified drivers and is



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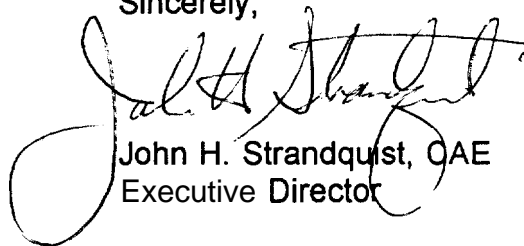
making efforts to improve their training programs. The creation in 1986 of the Professional Truck Driver Institute of America (PTDIA), by the industry, to certify acceptable training programs offered by truck driver training schools, colleges/vo-techs and carriers, was a giant step in the right direction.

These efforts plus the valid and reliably administered state testing programs which are now being used throughout the United States have gone a long way in addressing commercial vehicle safety.

If FHWA determines that a national training standard needs to be set, the program should be established in tandem with the motor carrier industry and enforced by the rule making body without placing additional burdens on the states. Any additional requirements that may be placed on the states as part of the CDL program should be funded by the rule making entity.

AAMVA is glad to have the opportunity to respond to this ANPRM. As always, we are willing to work with FHWA and will be happy to provide additional input if requested.

Sincerely,



John H. Strandquist, QAE
Executive Director

JHS:MRC:nmb